

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SOULFUL NUTRITION INC., d/b/a
REMEDY ORGANICS,

Plaintiff,

v.

REMEDY DRINKS PTY., LTD., and
REMEDY DRINKS USA, LLC

Defendants.

Misc. Action No.: _____

Underlying Case No.: 2-21-cv-17455
(D.N.J.)

**MOTION TO ENFORCE FOREIGN SUBPOENA AND TO COMPEL
PRODUCTION OF DOCUMENTS AND DEPOSITION TESTIMONY**

COMES NOW, Soulful Nutrition Inc., d/b/a Remedy Organics (“Soulful Nutrition” or “Plaintiff”) and, Pursuant to Fed. R. Civ. P. 37(a) and 45, files its Motion to Compel the Production of Documents and Deposition Testimony of Delta Airlines, Inc. and to Enforce the Subpoena (“Motion”) issued by the United States District Court for the District of New Jersey, and served on Delta Airlines, Inc. on May 8, 2023. Plaintiff’s Motion is made on the grounds set forth in the Memorandum of Law in Support of the Motion filed contemporaneously herewith and the Exhibits thereto, which are expressly incorporated herein by reference, including because Delta Airlines has failed to respond to comply with the

Subpoena and attempts by Plaintiff's counsel to have Delta Airlines comply with the Subpoena have been expressly refused by Delta Airlines.

Respectfully submitted, this 26th day of May, 2023.

/s/ Nicholas B. Corser, Esq.

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*Application for Pro Hac Vice Admission To
Be Filed:*

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CERTIFICATE OF COMPLIANCE

I hereby certify that this document has been prepared in a Times New Roman, 14-point font and otherwise complies with Local Rule 5.1(C), NDGa.

This 26th day of May, 2023.

/s/ Nicholas B. Corser, Esq.

Nicholas B. Corser

Georgia Bar No. 290744

FOX ROTHSCHILD, LLP

Attorney for Soulful Nutrition, Inc.

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE I hereby certify that the forgoing document will be served on Respondent in a manner prescribed by Fed. R. Civ. P. 5, and a further proof of service will be filed with the Court when service is effectuated.

/s/ Nicholas B. Corser, Esq.

Nicholas B. Corser

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